

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA	]	
	]	Cr. No. 19-cr-142-01-LM
v.	]	
	]	
NATHAN CRAIGUE	]	

**DEFENDANT'S MOTION TO SEAL MOTION IN LIMINE**  
**GOVERNMENT ASSENTS TO SEALING**

NOW COMES the defendant, by and through counsel, and respectfully requests that this Court issue an Order sealing Defendant's Motion in Limine (filed separately) at Level I, and all related docket entries. Grounds follow.

Pursuant to Local Rule 83.12(c), a motion to seal must be filed separately from the item(s) sought to have sealed, and must explain the reason why the item(s) should be sealed and the level at which they should be sealed.

Mr. Craigue is scheduled to select his jury on November 10, 2020. The defendant's Motion in Limine concerns the credibility of a government witness, and the materials sought to be introduced may be considered confidential pursuant to New Hampshire Revised Statute 281-A:21-b. The relevant statute states:

**281-A:21-b Confidentiality of Workers' Compensation Claims.** – Proceedings and records of the department of labor with respect to workers' compensation claims under RSA 281-A shall be exempt from RSA 91-A. Nothing in this section shall prohibit the department of labor from releasing information on a person's claim or claims to the person, the person's legal representative, attorney, health care providers, employer, the employer's workers' compensation insurer, the attorneys for the employer or employer's insurer, or state and federal agencies with relevant jurisdiction. Notwithstanding the provisions of this section, information relating to a person's claim or claims may be released to other parties only with the prior written permission of the claimant.

The defendant moves the Court to seal at Level I his Motion in Limine, and all related docket entries, because they contain information obtained from confidential records.

AUSA Anna Dronzek assents.

No memorandum of law is necessary to the resolution of the issues raised in this Motion to Seal.

WHEREFORE, the defendant respectfully requests that this court issue an Order sealing Defendant's Motion in Limine (filed separately), and all related docket entries.

Respectfully submitted,  
NATHAN CRAIGUE  
By his attorney,

Date: October 29, 2020

/s/ Dorothy E. Graham  
Dorothy E. Graham  
N.H. Bar No. 11292  
Assistant Federal Defender  
Federal Defender Office  
22 Bridge Street – 3rd Floor  
Concord, NH 03301  
Tel. (603) 226-7360  
E-mail: [dorothy\\_graham@fd.org](mailto:dorothy_graham@fd.org)

#### **CERTIFICATE OF SERVICE**

I, Dorothy E. Graham, hereby certify that on October 29, 2020 a true copy of the above document was served upon the government through ECF.

/s/ Dorothy E. Graham  
Dorothy E. Graham